

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GEORGE CARY,

Plaintiff,

v.

NEW ENGLAND COMPOUNDING
PHARMACY, INC. d/b/a NEW ENGLAND
COMPOUNDING CENTER, *et al*
Defendants.

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) Civil Action No. 1:13-cv-10228-FDS
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**PAUL D. MOORE, IN HIS CAPACITY AS CHAPTER 11 TRUSTEE OF THE
DEFENDANT NEW ENGLAND COMPOUNDING PHARMACY, INC. D/B/A NEW
ENGLAND COMPOUNDING CENTER'S ASSENTED-TO MOTION FOR
EXTENSION OF TIME TO RESPOND TO DEFENDANT AMERIDOSE, LLC'S
MOTION FOR WITHDRAWAL OF REFERENCE BY UNITED STATES DISTRICT
COURT**

Paul D. Moore, in his capacity as Chapter 11 Trustee of the Defendant New England Compounding Pharmacy, Inc. d/b/a New England Compounding Center¹ ("Trustee"), files this Assented-to Motion for Extension of Time to Respond to Defendant Ameridose, LLC's ("Ameridose") Motion For Withdrawal of Reference by United States District Court ("Motion for Withdrawal"). Specifically, the parties have agreed to extend the time in which Trustee must respond to Ameridose's Motion for Withdrawal up to and including March 11, 2013. As grounds for this motion, the additional time will allow the Trustee to evaluate and appropriately respond to this Motion for Withdrawal.

Counsel for Ameridose has assented to this Motion.

¹ Trustee Paul D. Moore's Application to Employ Duane Morris LLP as Counsel to Chapter 11 Trustee *nunc pro tunc to January 25, 2013*, filed on February 7, 2013, is currently pending in the United States Bankruptcy Court for the District of Massachusetts in case number 12-19882.

WHEREFORE, Trustee respectfully requests that the Court grant his Assented-to Motion for Extension of Time to Respond to Defendant Ameridose LLC's Motion for Withdrawal of Reference by the United States District Court by extending the time in which Trustee must respond to the Motion for Withdrawal to and including March 11, 2013.

Dated: February 22, 2013,

Paul D. Moore, in his capacity as Chapter 11
Trustee of the Defendant,
By his proposed attorneys,

/s/ Michael R. Gottfried

Michael R. Gottfried (BBO # 542156)

Jennifer L. Mikels (BBO # 682199)

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Certificate Pursuant to Local Rule 7.1(A)(2)

The undersigned hereby certifies that counsel for the movants conferred with counsel for the plaintiffs, who assented to this motion.

/s/ Michael R. Gottfried

Michael R. Gottfried

Certificate of Service

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as unregistered participants on February 22, 2013.

/s/ Michael R. Gottfried

Michael R. Gottfried